



# Anti-Corruption Directive

## 1. Purpose and objective

---

This directive is an addition to the Business Ethics Policy and aims to specify its anti-corruption statements.

As an employee within MCC, you must undertake to follow this Anti-Corruption Directive and any other directives and programs that MCC may implement to prevent corruption and unfair business ethics at any time. If ever you will face a situation in which you have doubts on how to act you should check with your immediate superior.

## 2. Directive

---

- All employees and representatives are expected to show honesty and integrity in dealing with other employees, customers, suppliers, business partners, organizations and authorities.

The MCC Group has zero tolerance for all forms of corruption and makes active efforts to ensure that this does not occur within the MCC Group.

- The term corruption refers to abuse of a position of trust for own or the company's gain, for example through the use of bribes
- It is forbidden to offer, promise or give as well as request, accept a promise of or receive a bribe
- A bribe is a gift or other benefit that might influence another person, as part of their employment or duties, to show improper favor to the giver.

MCC employees may, for example, not offer, give, receive or request gifts, services, entertainment or other rewards that:

- Violate accepted business practice
- Have an unreasonable value
- Consist of money, securities, cash loans, and other types of personal payments in the form of discounts, commissions, bonuses or fees
- Consist of pure leisure or vacation trips
- Violate existing laws and/or go beyond local custom
- Are offered to people employed in the public sector in conjunction with imminent or ongoing procurement or decisions which constitute the exercise of authority
- Are other rewards which due to their value or other relevant circumstances are typically likely to improperly influence the recipient in the exercise of their professional duties or in another manner risk embarrassing the company or the employee in the event they become public knowledge.

This does not prevent MCC employees from receiving or offering rewards designed to retain and promote good business relationships with customers and other business partners, when such rewards are modest, openly accepted and offered and otherwise compliant with the Business Ethics Policy.



- We work systematically to prevent corruption

MCC Group management and the management of each company in the group are responsible for regular analysis of the risks of corruption related to their own operations, and to maintain an adequate anti-corruption program and implement any other measures regarded as necessary in order to prevent the corruption risks identified in the risk analysis.

- We work systematically to avoid conflicts of interest
  - MCC's employees shall always work in MCC's best interests and avoid all acts that might be perceived as favoring a company, organizations, individuals or other stakeholders at MCC's expense. Employees shall avoid all types of activity that violate the company's interests or have a negative effect on the employee's judgement and integrity
  - Agreements with or other forms of assignments to related parties shall be avoided, and always be reported to and approved by the nearest manager or the company's Group management.
- We support and aim to achieve fair competition

Employees in the MCC Group must therefore comply with all relevant competition rules and refrain from concluding unlawful anti-competitive agreements as well as exchanging unlawful price and/or market information with competitors.